

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JAMES ZIMMERMAN, MARV
PINZON, and WILLIAM G. VAZQUEZ,**

Plaintiffs,

v.

**ROBERT R. ROCHE, ASHFORD S.
MCALLISTER, FRANK A. FERRARO,
E. SCOTT PRETORIUS, QUANTUM
MEDICAL RADIOLOGY, P.C., U.S.
TELERADIOLOGY, L.L.C., U.S.
MAMMO, L.L.C., NEUROSTAR
SOLUTIONS, INC., NIGHTHAWK
PHYSICIAN INVESTORS, LLC, and
JOHN DOES 1 through 10,**

Defendants.

Civil Action No. 09-CV-0605-AT

**QUANTUM MEDICAL RADIOLOGY,
P.C.,**

Counterclaim-Plaintiff,

v.

**JAMES ZIMMERMAN, MARV
PINZON, WILLIAM G. VAZQUEZ,
JOSEPH CHRISTOPHER RUDÉ, III,
and GEORGIA IMAGING
ASSOCIATES, INC.,**

Counterclaim-Defendants.

NOTICE OF DEPOSITION OF DEFENDANT FRANK A. FERRARO

PLEASE TAKE NOTICE THAT on Thursday, December 22, 2011, at 10:00 o'clock a.m., Plaintiffs James Zimmerman, Marv Pinzon, William G. Vazquez and Counterclaim Defendants Joe Christopher Rudé, III and Georgia Imaging Associates, Inc. will take the deposition of Defendant Frank A. Ferraro at the offices of ARNALL GOLDEN GREGORY LLP, 171 17th Street, N.W., Suite 2100, Atlanta, Georgia 30363.

The deposition will be upon oral examination for all purposes allowed by law, including cross examination, discovery, and the preservation of testimony for use at a hearing or trial if and where appropriate; will be taken before an officer duly authorized to administer oaths; and will be preserved by stenographic and/or videographic means.

This 8th day of December, 2011

KASOWITZ, BENSON, TORRES & FRIEDMAN, LLP

By: /s/ Paul G. Williams

David E. Spalten

Georgia Bar No. 669010

Paul G. Williams

Georgia Bar No. 764925

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing NOTICE OF DEPOSITION OF DEFENDANT FRANK A. FERRARO with the Clerk of Court using the CM/ECF system which will automatically send electronic notification of this filing to the following attorneys of record:

<p>Henry M. Perlowski Edward A. Marshall ARNALL GOLDEN GREGORY LLP 171 17th Street, N.W. Suite 2100 Atlanta, Georgia 30363</p> <p><i>Attorneys for Robert R. Roche, Ashford S. McAllister, Frank A. Ferraro, E. Scott Pretorius, Quantum Medical Radiology, P.C., U.S. Teleradiology, L.L.C., U.S. Mammo, L.L.C., and Nighthawk Physician Investors, LLC</i></p>	<p>Arthur D. Brannan Scott Lange DLA PIPER LLP (US) One Atlantic Center 1201 West Peachtree Street Suite 2800 Atlanta, Georgia 30309-3450</p> <p><i>Attorneys for Defendant Neurostar Solutions, Inc.</i></p>
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This 8th day of December, 2011.

/s/ Paul G. Williams

Paul G. Williams

Georgia Bar No. 764925